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13 **UNITED STATES DISTRICT COURT**  
14 **NORTHERN DISTRICT OF CALIFORNIA**

15 ADOBE SYSTEMS INCORPORATED, a  
16 Delaware Corporation,

17 Plaintiff,

18 v.

19 METROTECH SOLUTIONS USA INC., a  
Delaware Corporation; 9199-6546 QUEBEC  
20 INC., a Canadian Quebecois Corporation  
doing business as METROTECH  
21 SOLUTIONS INC., METROTECH  
SOLUTIONS and METROTECH; and DOES  
22 2-10, Inclusive,

23 Defendants.

Case No.: 3:14-cv-04871-EMC

**SECOND STIPULATION TO  
CONTINUE HEARING AND BRIEFING  
SCHEDULE ON PLAINTIFF'S MOTON  
FOR CONTEMPT AND [PROPOSED]  
ORDER**

24 Plaintiff ADOBE SYSTEMS INCORPORATED ("Plaintiff"), by and through its counsel  
25 of record, and Defendants METROTECH SOLUTIONS USA INC.; 9199-6546 QUEBEC INC.,  
26 d/b/a METROTECH SOLUTIONS INC., METROTECH SOLUTIONS and METROTECH;  
27 9188-0047 QUEBEC INC. d/b/a UKTECH STORE; and 9199-6587 QUEBEC INC. d/b/a IT  
28

1 FACTORY (collectively “Defendants”), by and through their counsel of record, hereby stipulate  
2 and agree as follows:

3 **RECITALS**

4 On August 20, 2015, the Court entered a PERMANENT INJUNCTION AGAINST DEFENDANTS  
5 AND DISMISSAL WITH PREJUDICE (D.E. 31) (“Injunction”).

6 On June 1, 2017, Plaintiff filed its MOTION FOR CONTEMPT AND SANCTIONS AGAINST THE  
7 ENJOINED PARTIES (D.E. 33) (“Motion”), asserting that Defendants violated the Injunction by  
8 dealing in Adobe products, specifically through their illegal distribution of unbundled (and in  
9 one instance, previously activated) Adobe software products.

10 On June 14, 2017, the Parties filed a STIPULATION TO CONTINUE HEARING AND BRIEFING  
11 SCHEDULE ON PLAINTIFF’S MOTION FOR CONTEMPT (D.E. 35) (“First Stipulation”) in order to  
12 allow the Parties time to resolve the issues addressed in the Motion.

13 On June 15, 2017, the Court granted the Parties’ First Stipulation and continued the  
14 hearing on the Motion to August 3, 2017, with response dates adjusted accordingly.

15 Thereafter, Defendants produced certain documents to Plaintiff in an effort to resolve  
16 Plaintiff’s claims, and the Parties have been working towards resolution of the issues contained  
17 in the Motion. The Parties, however, need additional time to pursue such a resolution.

18 **AGREEMENT**

19 Accordingly, Plaintiff and Defendants hereby stipulate and respectfully request the Court  
20 continue the hearing on the Motion to August 24, 2017, or a date thereafter acceptable to the  
21 Court.

22 Additionally, Plaintiff and Defendants hereby stipulate and respectfully request that  
23 Defendants’ response to the Motion be due on or before August 3, 2017.

24  
25 ///

26  
27 ///

1 Plaintiff and Defendants hereby stipulate and respectfully request that Plaintiff's reply  
2 shall be due on or before August 10, 2017.

3  
4 DATED: July 7, 2017

JOHNSON & PHAM, LLP

5 By: /s/ Nicole Drey Huerter  
6 Nicole Drey Huerter, Esq.  
7 Attorneys for Plaintiff  
ADOBE SYSTEMS INCORPORATED

8 DATED: July 7, 2017

LAW OFFICES OF GEORGE A. SHOHET,  
A PROF. CORP.

10 By: /s/ George A. Shohet  
11 Pierre Francis  
12 Attorney for Defendants  
13 METROTECH SOLUTIONS USA INC.; 9199-  
14 6546 QUEBEC INC., d/b/a METROTECH  
15 SOLUTIONS INC., METROTECH SOLUTIONS  
16 and METROTECH; 9188-0047 QUEBEC INC.  
17 d/b/a UKTECH STORE; and 9199-6587 QUEBEC  
18 INC. d/b/a IT FACTORY

19 **~~PROPOSED~~ ORDER**

20 Pursuant to Stipulation, the hearing on Plaintiff's MOTION FOR CONTEMPT AND  
21 SANCTIONS AGAINST THE ENJOINED PARTIES ("Motion") is reset from August 3, 2017, to  
22 August 24, 2017. Defendants' response to the Motion is due three (3) weeks prior  
to the hearing date. Plaintiff's reply to the Motion is due two (2) weeks prior to the hearing date.

23 IT IS SO ORDERED.

24  
25 DATED: July 11, 2017

